( B	110
Attorney for Plaintiff	4
Date:	, 2013
Attorney for Defendar	
Date: 1/7/77	2013

I HEREBY CERTIFY THAT A COPY OF THIS CERTIFICATE HAS BEEN FILED WITH THE CLERK AND MAILED TO JOHN DRAKE, 120 E. MAIN STREET, MURFREESBORO, TN 37130

NOTE: IN THE EVENT BOTH ATTORNEYS DO NOT SIGN OR ONE DISAGREES TO FILING, THE ATTORNEY SEEKING A COURT DATE SHALL FILE A MOTION ASKING THE COURT TO ENTER A CERTIFICATE OF READINESS AND SET THE CASE. THE MOTION SHALL STATE THAT THE CASE IS AT ISSUE AND ADVERSE COUNSEL REFUSES TO SIGN THE CERTIFICATE OF READINESS.



IN THE FOURTH CIRCU	IT COURT OF DAVIDSON	COUNTY, TENNESSEE
	AT NASHVILLE	2013 OCT 14 PM 3: 50
AARON L. SOLOMON,	)	AICHARO R. ROOKE A. O. Firk
Plaintiff,		Cottango oc
vs.	) Case No. 1	3D1446
ANGELIA SOLOMON,	į	
Defendant.	í	

# ORDER DENYING MOTION FOR APPOINTMENT OF GUARDIAN AD LITEM

This cause came on to be heard on the 6<sup>th</sup> day of September, 2013, upon the *Philip* Honorable Phillip Smith, 4<sup>th</sup> Circuit, upon the Defendant's Motion for Appointment of Guardian at Litem. The Court having heard arguments of counsel hereby finds this Motion to not be well taken and said Motion is hereby denied.

This the 14 day of October, 2013.

HON. PHILLE SMITH

APPROVED FOR ENTRY:

JOHN D. DRAKE, #012405

Attorney at Law

120 East Main Street

3rd Floor, Bank of America

Murfreesboro, TN 37130

(615)895-0414

## CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and exact copy of the above pleading has been delivered to D. Scott Parsley, 219 Second Avenue, North, Suite 300, Nashville, TN 37201 via US Mail, postage prepaid, this the day of October, 2013.

John D. Drake



IN THE FOURTH CIRCL	UIT COURT OF DAVIDSO AT NASHVILLE	ON COUNTY, TENNESSEE
AARON L. SOLOMON,	)	PH 1:42
Plaintiff,	į	DAMO
	) Case No	o. 13D1446
VS,	) case in	S. C.
ANGELIA SOLOMON,	)	
Defendant.	) ·	

# MOTION FOR CONTEMPT

Comes now the Defendant Mother, by and through her undersigned counsel, and moves this Honorable Court to hold the Plaintiff in contempt. As grounds for said Petition, Defendant would state as follows:

- 1. The Plaintiff filed for divorce on May 13, 2013. Upon filing of the divorce, a Restraining Order was issued. Said restraining order stated neither party must not change, cancel, or assign any insurance policy that covers either the spouse or the children.
- Further, following a lengthy hearing in June 2013, the Defendant was awarded spousal support for the sole purpose of making her Tahoe payment, utilities and groceries.
- 3. In August, Defendant became aware that her automobile insurance had lapsed due to the Plaintiff not making the payment on said policy, in direct violation of the Restraining Order.
- 4. A Motion was filed on August 20, 2013, addressing the non-payment of the insurance policy. However, this request was denied by the Court on September 6, 2013.

5. The Defendant was involved in an automobile accident on September 6, 2013, due to no fault of her own, which did approximately \$6,500 in damage to her vehicle. (Please refer to estimate attached hereto.)

WHEREFORE, Defendant prays:

- 1. That the Plaintiff be found in willful contempt of court.
- 2. That the Father be incarcerated for 10 days for violation of the Restraining Order.
- That the Court order the Plaintiff to immediately reinstate Defendant's auto insurance.
- 4. That the Court order the Plaintiff responsible for the damage to the Defendant's vehicle.
- 5. For any, further and general relief which the Defendant may be entitled.

Respectfully submitted,

JOHN DEBRAKE, #012405

Attorney at Law

120 East Main Street

3<sup>rd</sup> Floor, Bank of America

Murfreesboro, TN 37130

(615)895-0414

## CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and exact copy of the above pleading has been delivered to D. Scott Parsley, 219 Second Avenue, North, Suite 300, Nashville, TN 37201 via US Mail, postage prepaid, this the day of August 2013.

Jehn D. Drake



€oby

IN THE FOURTH CIRCUIT COURT OF DAVIDSON COUNTY, TENNESSEE

AARON L. SOLOMON,

Plaintiff,

vs.

ANGELIA SOLOMON,

Defendant.

Case No. 13D1446

### RESPONSE TO MOTION TO COMPEL

Comes now the Defendant Mother, by and through her undersigned counsel, and responds to the Plaintiff's Motion to Compel and would state that the the Defendant was involved in a motor vehicle accident on September 6, 2013, which resulted in a head injury and concussion. Since that time, the Defendant has been unable to look for the requested documents and Defendant would request some additional time to provide said documentation.

Respectfully submitted,

JOHN D. DRAKE, #012405

Attorney at Law

120 East Main Street

3rd floor, Bank of America

Murfreesboro, TN 37130

(615)895-0414

## CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and exact copy of the above pleading has been delivered to D. Scott Parsley, 219 Second Avenue, North, Suite 300, Nashville, TN 37201 via US Mail, postage prepaid, this the day of August, 2013.

John D. Drake



Copy

STATE OF TENNESSEE	SU	JBPOENA	WI	CIVIL ACTION
DAVIDSON COUNTY Circuit Court	TESTIMONY/PRODUCTION REQUIRED (SEE NOTICE BELOW)  MEDICAL RECORDS (SEE HIPAA REQUIREMENT BELOW)  DOCKET NO. 130-144			DOCKET NO. 13D-1446
PLAINTIFF Haron L. 5	Solamon	DEFENDA		Mon
TO: (NAME, ADDRESS & TELEPHON			VIX SAIN	Method of Service:
Elaine Townes	s Jay			☐ Davidson County Sheriff
	•			Personal Service
				Out of County Sheriff
addition, if indicated, you are to could result in punishment by i	bring the Items liste	ed. Failure to appe	ar may result	urpose of giving testimony. In In contempt of Court which
TIME DATE	- 2/ 200	ITEMS TO BRING:	1 . 11	espondence between
9:00a.4 September		May and Ass	all cons	OMON AUGUST
1-Public Square,	Room-302	Con and Hig	- Jul 101	since
Nashvillo, TN-37	55.5W	January 1.	2013. A	ny and all Correspondent
D. Scott Parsley and 219 2Nd Ave. North,	Associates	between yo	en and A	aron Solo Mon since
Nashville, TN 372	Suite 300	January 1, 2	013. Any &	nd all Correspondence
615-244-8118	201	between you	and Dan	ny Joe Huffines
1,000,000		Shall bedefin	ed for purp	013. Correspondence osses of this subpoena as , card, etc.
This subpoena is being issued	on behalf of	Additional Li	st Attached	; card, etc.
Attornov: (NAME ADDRESS & TELEPH		DATE ISSUED: 9 -		
Attorney (NAME ADDRESS & TELEPH D. Scott Parsley			RICHARD R	
D. Scott Parsley and 219 2nd Ave N., Suite Nashville, TN 3720	Associates		Circuit Co	ourt Cierk
Nashville, TN 3720	39000	BV: (8	1 Jane	
ATTORNEY'S SEGNATURE:	pertit	31	DEP	UTY CLERK
DESIGNEE:		To request a	n ADA accommodatio	on, please contact Dart Gore at 880-3309.
DESIGNEE'S SIGNATURE:	Here was	I	-	
Testimony/Production require		(/PRODUCTION NO	TICE	
The failure to serve an objection to this Subpoena within twenty-one (21) days after the day of service of the Subpoena waives all objections to the Subpoena, except the right to seek the reasonable costs for producing books, papers, documents, electronically				
stored information, or tangible things  Medical Records Requested –			_	
	•	IPAA NOTICE		
A copy of this Subpoens has be	_		atient by mail or t	acsimile on the day
of	, 20, so as to allow	him/her twenty-one (2	1) days to:	
(A) Serve the recipient of the facsimile to the party that s	served the Subpoens, ar	nd		
(B) Simultaneously file and se Local Rule §22.10.	rve a Motion for a Protec	ctive Order consistent	with the requiren	nents of T.R.C.P. 26.03, 26.07 and
If no objection is made within twenty-one (21) days of the above date, you shall process this Subpoena and produce the documents by the date and time specified in the Subpoena. The signature of counsel or party on the Subpoena is certification that the above Notice was provided to the patient.				
hanni himi	SUBMIT: Original	, Witness Copy & Fil	e Copy) SPK	7 P#C (Revised 7/23/13)

[Revised 7/23/13]



AT NASHVILLE

AT NASHVILLE

AU J 2:8 2013

AU J 2:8

#### NOTICE OF HEARING

Comes now the Defendant Mother, by and through her undersigned counsel, and hereby gives notice of the hearings on the Motion for Visitation, Motion for Guardian ad Litem, and Motion for Payment of Expenses is hereby reset for September 6, 2013, at 9:00 a.m.

Respectfully submitted,

JOHN D. DRAKE, #012405 Aftorney at Law 120 East Main Street 3rd Floor, Bank of America Murfreesboro, TN 37130 (615)895-0414

## **CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that a true and exact copy of the above pleading has been delivered to D. Scott Parsley, 219 Second Avenue, North, Suite 300, Nashville, TN 37201 via US Mail, postage prepaid, this the day of August, 2013.

John D. Drake



doba

IN THE FOURTH COURT FOR DAVIDSON COUNTY, TENNESSEE

AARON L. SOLOMONIS AUG 30 PH 3: 49

Plaintiff,

HEHARD R. ROOKER, CLERK

v,

Hemit &c

Docket No. 13D-1446

ANGELIA SOLOMON,

Defendant.

# RESPONSE TO MOTION FOR VISITATION

Father, in response to the Motion for Visitation, would state that this matter has been addressed by the Court's ruling and is moot. The Court has, in its previous Order, stated how this matter would rest as relates to the visitation and what was required of Mother. To date, counsel for Father has not received a report from Dr. Freeman.

Respectfully submitted,

D. SCOTT PARSLEY, #13606 D. SCOTT PARSLEY & ASSOCIATES 219 Second Avenue North, Suite 300 Nashville, TN 37201 (615) 244-8118 (615) 244-8842 Facsimile

## CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing document has been served on John Drake, 120 E. Main Street, Murfreesboro, TN 37130, by placing same in the U.S. Mail, postage prepaid, on the 30 day of August, 2013.

D. SCOTT PARSLEY

COURT FOR DAVIDSON COUNTY, TENNESSEE

AARON L. SOLOMON,

Plaintiff,

٧.

Docket No. 13D-1446

ANGELIA SOLOMON,

Defendant.

## RESPONSE TO MOTION FOR APPOINTMENT OF GUARDIAN AD LITEM

Father, in response to the Motion filed by Mother, would state that the same is without basis. As cause, he would state and show unto this Honorable Court that this Court at the previous hearing had the opportunity to see and observe Defendant and the Court posed numerous questions to Defendant and has issued a ruling as relates to this matter which is of record in this Court. Father would state and show unto this Honorable Court that there is no necessity for a Guardian ad Litem and with both parties being unemployed, neither can shoulder the additional burden of a Guardian ad Litem.

OTT PARSLEY! #13606

D. SCOTT PARSLEY & ASSOCIATES

219 Second Avenue North, Suite 300

Nashville, TN 37201

(615) 244-8118

(615) 244-8842 Facsimile

# CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing document has been served on John Drake, 120 E. Main Street, Murfreesboro, TN 37130, by placing same in the U.S. Mail, postage prepaid, on the 30 day of August, 2013.

D. SCOTT PARSLEY



POPY 2013 TUB 15:02 PAX 615 0155 Drake Law Office

IN THE FOURTH CIRCUIT COURT OF DAVIDSON COUNTY, TENNESSEE

AARON L. SOLOMON,

Facsimile Rec'd & 2018 at 3:02 p.m.

Plaintiff,

PRADUNER, Clerk

AUS 2 D 2013

VS.

y Deputy Deputyse No. 13D1446

ANGELIA SOLOMON,

Defendant.

## MOTION FOR PAYMENT OF EXPENSES

Comes now the Defendant Wife, by and through her undersigned counsel, and hereby moves this Honorable Court for an order requiring the Plaintiff to pay certain marital obligations. As grounds for said Motion, your Mother would state as follows:

- Per order of the Court on June 21, 2013, was only required to be responsible for the "electric bill and utility bills and the Tahoe payment."
- The Wife has received notification from her auto insurance that her policy has been cancelled due to non-payment.
- 3. The Husband has failed to pay for the yard work to the parties' marital home as well as the replacement of a window which was broken while the parties resided together.

WHEREFORE, PREMISES CONSIDERED, your Mother prays that this Court order the Husband to pay any martial financial obligations over and above the electric and utility bills and Tahoe payment.

Respectfully submitted,

JOHN D. DRAKE, #012405

Attorney at Law
120 East Main Street
3<sup>rd</sup> Floor, Bank of America
Murfreesboro, TN 37130
(615)895-0414

## CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and exact copy of the above pleading has been delivered to D. Scott Parsley, 219 Second Avenue North, Suite 300, Nashville, TN 37201 via US Mail, postage prepaid, this the day of August, 2013.

NOTICE OF HEARING

A hearing on the above Motion shall be set for August 30, 2013 at 9:00 a.m.



GOP 75/2013 TUB 15:05 PAX 615

IN THE FOURTH CIRCUIT COURT OF DAVIDSON COUNTY, TENNESSEE AT NASHVILLE FILED

AARON L. SOLOMON,

Facsimile Rec'd 8 20 13 at 3:05 p.m.

Plaintiff,

AUG 2 0 2013

vs.

OPPURASE No. 13D1446

ANGELIA SOLOMON,

Defendant.

## MOTION FOR VISITATION

Comes now the Defendant Mother, by and through her undersigned counsel, and hereby moves this Honorable Court for an order requiring the Plaintiff to pay certain marital obligations. As grounds for said Motion, your Mother would state as follows:

- 1. As per the prior order of June 21, 2013, the Mother was not allowed any visitation or contact with the minor children. The Mother was required to have a psychological evaluation with Dr. Freeman in order to determine if she was a harm to herself or others.
- 2. To date, the Mother has attended two sessions with Mr. Freeman as well as further testing with Dr. Brown. Per the Doctor's ethical guidelines, if either doctor felt the Mother was a harm to herself or others they had no choice but to retain her.

Neither Dr. Freeman or Dr. Brown recommended the Defendant be hospitalized pending their reports. Certainly, the Defendant is not a danger to herself or her children.

- 3. The Mother has resided on her own for a period of approximately three months with no indication of any intent to harm herself or others.
- The Mother fears any additional time away from the children could cause damage to the mother child relationship.

WHEREFORE, PREMISES CONSIDERED, your Mother prays that this Court set a vistiation schedule in order to allow the Mother to reconnect with the minor children and prevent damage to the Mother/child relationship.

Respectfully submitted,

JOHN D. DRAKE, #012405

Aftorney at Law

1/20 East Main Street 3<sup>rd</sup> Floor, Bank of America Murfreesboro, TN 37130

(615)895-0414

#### CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and exact copy of the above pleading has been delivered to D. Scott Parsley, 219 Second Avenue, North, Suite 300, Nashville, TN 37201 via US Mail, postage prepaid, this the day of August, 2013.

John D. Drake

NOTICE OF HEARING

A hearing on the above Motion shall be set for August 30, 2013 at 9:00 a.m.



## IN THE FOURTH CIRCUIT COURT OF DAVIDSON COUNTY, TENNESSEE AT NASHVILLE

AARON L. SOLON	ion, FILED	
Plaintiff,	Facsimile Rec'd 8 2013	et 3:08 p.m.
vs.	AUJ 2 0 2013	) Case No. 13D1446
ANGELIA SOLOM	IONICHARD & OCKER, CIE	}k puty
Defendant		ĵ

# MOTION FOR APPOINTMENT OF GUARDIAN AD LITEM

Comes now the Defendant Wife, by and through her undersigned counsel, and hereby moves this Honorable Court for an order appointing a guardian ad litem to represent the children's best interest. As grounds for said Motion, your Mother would state as follows:

- This matter is an extremely emotional and difficult case involving multiple allegations of mental Instability
- The Mother has received concerns from outside parties expressing 2. concern for the children's welfare.
- The Mother has received photos of the children from the Father, 3. depicting their current appearance. She contends that the children appear disspirited, dissheveled and appearing to have lost weight. When she asks the Father if the children have milk or being fed, he often is evasive or equivocal. Mother fears the children were not being properly cared for by the Father.
- Mother feels the children are in need of a voice and potentially therapy or counseling to assist them in dealing with the issues caused from the actions of their parents.

WHEREFORE, PREMISES CONSIDERED, your Mother prays that this Court appoint a guardian ad litem for the benefit of the children.

Respectfully submitted,

JOHN D. DRAKE, #012405

Attorney at Law
120 East Main Street
3<sup>rd</sup> Floor, Bank of America
Murfreesboro, TN 37130
(615)895-0414

# CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that a true and exact copy of the above pleading has been delivered to D. Scott Parsley, 219 Second Avenue, North, Suite 300, Nashville, TN 37201 via US Mail, postage prepaid, this the day of August, 2013.

John D. Drake

NOTICE OF HEARING

A hearing on the above Motion shall be set for August 30, 2013 at 9:00 a.m.



IN THE FOURTH CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE

AARON L. SOLOMON,

2013 AUG 12 PM 4: 11

Plaintiff,

RICHARD R. ROOK CLERK

Docket No. 13D-1446

ANGELIA SOLOMON,

Defendant.

# MOTION FOR SANCTIONS AND TO COMPEL

Plaintiff would state and show unto this Honorable Court that on the 4th day of June 2013, he propounded Interrogatories and Request for Production of Documents to Defendant. He would state and show unto this Honorable Court that the answers to the same are overdue. Counsel has made requests for the discovery responses prior to filing this Motion. Additionally, Counsel for Plaintiff sent a letter to Counsel for Defendant on July 15, 2013. Plaintiff requests this Honorable Court impose sanctions and compel answers to the above and that Counsel be awarded attorney's fees incurred in the prosecution in this matter.

Respectfully

D. SCOTT PARSLEY, #13606

D. SCOTT PARSLEY & ASSOCIATES

219 Second Avenue North, Suite 300

Nashville, TN 37201

(615) 244-8118

Copy

# CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing document has been served on John Drake, 120 E. Main Street, Murfreesboro, TN 37130, by placing same in the U. S. Mail, postage prepaid, on this <a href="tel://december///december-12013">/ Zday of August, 2013</a>.

D. SCOTT PARSLEY

THIS MOTION IS EXPECTED TO BE HEARD SEPTEMBER 6, AT 9:00 A.M.



IN THE FOURTH CIRCL	JIT COURT FOR DAVIDSO	N COUNTY, TENNESSEE
AARON L. SOLOMON,	)	2013 AUG -7 PM 2: 32
Plaintiff,	)	CHARDR. ROOKER. SEE
٧.	) Docket No	o. 13D-1446 - 0.6.
ANGELIA SOLOMON,	)	
Defendant.	Ś	

## **ORDER**

This cause came to be heard on the 19<sup>th</sup> day of July, 2013, before the Honorable Philip E. Smith, Judge of the Fourth Circuit Court for Davidson County, Tennessee upon Mr. Solomon's Motion to be allowed to retrieve certain items of personal property. The Court, after review of the record, finds and Orders as follows:

- 1. It is, ORDERED, ADJUDGED AND DECREED that Father's Motion is well taken and is hereby granted. It is, further, Ordered that counsel for Ms. Solomon shall provide a series of dates in which Mr. Solomon can enter the marital residence to obtain his clothing and personal items, as well as the children's clothing, toys, etc.
- 2. It is, ORDERED, ADJUDGED AND DECREED that counsel for Mr. Solomon and counsel for Ms. Solomon shall supervise the retrieval of these items from the marital residence. It is Ordered that either party may videotape said retrieval of these items.
- 3. It is, ORDERED, ADJUDGED AND DECREED that Father shall provide Mother with the locality of the minor children, however, it does not require Father to inform Mother of the address of the children's location.

Enter this 7 day of Mugust

PHILIP E SMITH, JUDGE

APPROVED FOR ENTRY:

D. SCOTT PARSLEY, #13606

D. SCOTT PARSLEY & ASSOCIATES

219 Second Avenue North, Suite 300

Nashville, TN 37201

(615) 244-8118

(615) 244-8842 Facsimile

# CERTIFICATE OF SERVICE

N/Pegnl. 23817

I hereby certify that a true and exact copy of the foregoing document has been served on John Drake, 120 E. Main, Street, Murfreesboro, TN 37130, by placing same in the U. S. Mail, postage prepaid, on this 30th day of July, 2013.

D. SCOTP PARSLE

	T NASHVILLE
AARON L. SOLOMON,	) TOTAL THE STATE OF THE STATE
Plaintiff,	Dr. 100 943
vs.	Case No. 13D1446
ANGELIA SOLOMON,	
Defendant.	}

#### AGREED ORDER OF SUBSTITUTION OF COUNSEL

IT APPEARING to the Court, as evidenced by signature below, that RUSS HELDMAN and JOANIE L. ABERNATHY should be allowed to withdraw as counsel for the Defendant ANGELIA SOLOMON. It further appearing that Defendant has retained John D. Drake to represent her interests; therefore,

IT IS ORDERED, ADJUDGED AND DECREED that Russ Heldman and Joanie Abernathy are hereby relieved as counsel for the Defendant Angelia Solomon in this cause and is relieved of all responsibility in this action.

IT IS ORDERED, ADJUDGED AND DECREED that John D. Drake, Attorney at Law, duly licensed to practice in the State of Tennessee, is hereby substituted as counsel for the Defendant Angelia Solomon.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that a lien against any future marital settlement the Wife may receive shall be granted in favor of former counsel Russ Heldman and Joanie Abernathy to be resolved by agreement or court order.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that all proceeds presently held in escrow on behalf of the Defendant shall be transferred to the

office of John D. Drake and held in escrow for payment of Ms. Solomon's monthly expenses.

ENTERED this the 29th day of July, 2013.

Judge

APPROVED FOR ENTRY:

OHN D. DRAKE, #012405

Attorney at Law

/120 East Main Street

3rd Floor, Bank of America

Murfreesboro, TN 37130

(615)895-0414

Mounta Holland by John D. Drake with express permission

CANIE L. ABERNATHY, #11382

Attorney at Law

136 Fourth Avenue South

Franklin, TN 37064

615-790-1778

by John D. Drake with express permission

RUSS HELDMAN, #9989

Attorney at Law

218 Fourth Avenue, North

Franklin, TN 37064

615-599-9420

by John D. Drake with express permission

MICHAEL K. PARSLEY, #23817

D. SCOTT PARSLEY, #13606

Attorney at Law

219 Second Avenue North, Ste. 300

Nashville, TN 37201

615-244-8118



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IN THE FOURTH CIRCU	JIT COURT FOR DAVID	SON COUNTY, TENNESSEE  2013 JUL 19 AM 8: 20
AARON L. SOLOMON,	)	RICHARD R. ROOKER, DUING
Plaintiff,	) )	Ma Funcio
<b>v</b> .	) Docker	No. 13D-1446
ANGELIA SOLOMON,	) )	
Defendant.	j	

### <u>ORDER</u>

This cause came to be heard on the 21<sup>st</sup> day of June, 2013, before the Honorable Philip E. Smith, Judge of the Fourth Circuit Court for Davidson County, Tennessee upon Mr. Solomon's Motion for Mental Evaluation and Motion for Restraining Order; and upon Ms. Solomon's Motion to Dissolve Temporary Restraining Order, Motion for Temporary Family Support, Motion to Reinstate Health Insurance, and Motion for Temporary Parenting Plan. The Court, after testimony of the parties, argument of counsel and a review of the record as a whole, finds and Orders as follows:

- 1. It is, ORDERED, ADJUDGED AND DECREED that the parties are to swap the two (2) automobiles between them on Saturday, June 22, 2013 by 4:00 p.m. It is, ORDERED, ADJUDGED AND DECREED that Mr. Solomon shall be awarded the Volvo and Ms. Solomon shall be awarded the Tahoe, pendente lite.
  - 2. The Court finds that neither one of the parties are presently employed.
- 3. The Court finds that Ms. Solomon was hospitalized at Parthenon. Further, there are some concerns as relates to whether or not the Cobra coverage from Mr. Solomon's previous employer is in effect as the premiums have not been paid. It has been represented to the Court that the cost of the same is more than likely cost prohibitive as it is approximately \$1,500.00 per month for the Cobra conversion. However, Mr. Solomon represented to the Court that he had

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obtained insurance through Farm Bureau and it is necessary for Ms. Solomon to sign the necessary forms which were delivered on this date in Court to counsel for Ms. Solomon and they have to be turned back in by June 24, 2013. It is, therefore, ORDERED, ADJUDGED AND DECREED that Ms. Solomon shall have these returned to counsel for Mr. Solomon's office on Monday, June 24, 2013, in time for Mr. Solomon to make the appropriate filing of the same. There are some concerns expressed by counsel for the parties that a bill had not been received for Ms. Solomon's medical treatment and counsel for Ms. Solomon expressed some concern and did not know if the Cobra, if paid, will have retroactive effect and if the hospital stay would be covered. It is ORDERED, ADJUDGED AND DECREED that Mr. Solomon shall sign up for the Cobra or pay the Centennial bill. It is ORDERED, ADJUDGED AND DECREED that Ms. Solomon shall have the bill to Mr. Solomon for the Centennial stay by Monday, June 24, 2013, so that he can make a decision as relates to paying the Cobra insurance coverage or paying the bill for Wife's recent stay at Centennial.

- 4. The Court finds that it heard testimony from Mr. Dan Huffines, Ms. Solomon's Father, whom the Court finds to be a very believable person, although the Court finds that his testimony was not very specific.
- 5. The Court finds that the most damaging testimony in this matter came from Ms. Solomon herself. The Court finds, simply stated, it does not believe Ms. Solomon's testimony. The Court, as a finding of fact, finds that it does believe that Ms. Solomon attempted to commit suicide, although she testifies that such may have been for the purpose of getting attention. The Court is very concerned about Ms. Solomon's behavior, her mental health and her most recent behavior. The Court, further makes the finding of fact that Ms. Solomon did text the parties' son as demonstrated by the exhibit of such that has been placed into the record. The Court makes a

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finding that it does not believe for one minute that Ms. Solomon did not send the text to the parties' son and the Court was quite frank with Ms. Solomon. The Court makes a finding that it is quite concerned about the safety of the minor children even in a supervised setting with Mother.

- 6. It is, therefore, ORDERED, ADJUDGED AND DECREED that Mother shall be awarded no parenting time at this time until the Court receives Dr. Freeman's report. The Court is doing this not to punish Ms. Solomon but is looking to the best interest of the parties' two (2) minor children being as the Court is concerned about Ms. Solomon's mental state and is uncertain as to whether or not during one of these times she may be serious about her suicidal threats. The Court cannot discern whether such is to get attention, but is concerned that if she does decide to commit suicide and she does such when the minor children are with her, it would be devastating to the children.
- 8. The Court finds that at this time, it is of the opinion that Ms. Solomon is in no condition to work and that she is going to have to have a place to live even though both parties

Copy,

are unemployed. The Court, therefore, has admonished Mr. Solomon to attempt to get emergency distribution from his trust, wherein it Orders Mr. Solomon to make a payment of \$2,000.00 per month to Ms. Joanie Abernathy, one of Ms. Solomon's current counsel for her support. The Court requests that Ms. Abernathy pay Ms. Solomon's electric bill and utility bills and the Tahoe payment. Further, the Court requests that Ms. Abernathy investigate buying Kroger food cards to give to Ms. Solomon for her to use to purchase her groceries. At this point and time, the Court does not want to put any money in the hands of Ms. Solomon as a result of her spending habits. This Order is temporary and will be revisited by the Court in ninety (90) days which the Court would like to set on a Friday so that the Court can evaluate where Mrs. Solomon is in her life at that time. The Court is further hopeful that at such time she is through with treatment and has a job at that point, as she mentioned she had been interviewing for pharmacy position.

Enter this 19 day of

.2013

PHILIP ESMITH, JUDGE

APPROVED FOR ENTRY:

D. SCOTT PARSLEY, #13606

D. SCOTT PARSLEY & ASSOCIATES

219 Second Avenue North, Suite 300

Nashville, TN 37201

(615) 244-8118

(615) 244-8842 Facsimile

Copy,

## CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing document has been served on Joanie L. Abernathy, 136 Fourth Avenue South, Franklin, TN 37064, Russ Heldman, 218 Fourth Avenue North, Franklin, TN 37064, and John Drake, 120 E. Main Street, Murfreesboro, TN 37130, by placing same in the U. S. Mail, postage prepaid on this day of July, 2013.

D. SCOTT PARSLEY



Coba

IN THE FOURTH CIRC	UIT COURT FOR DAY AT NASHVILLE	VIDSON COUNTY, TENNESSEED
AARON L. SOLOMON, Plaintiff/Husband,	)	MEHAROR ROOKER 1:36
v.	)	NO. 13D-1446
ANGELIA SOLOMON, Defendant/Wife.	)	-0.5.

## MOTION TO WITHDRAW

COMES NOW Russ Heldman and Joanic L. Abernathy, and respectfully moves this Honorable Court for permission to withdraw as counsel for Wife, Angelia Solomon, for permission to no longer hold and disburse Wife's temporary support and for a lien against present and/or future funds of Wife and as grounds for this Motion, would state that Wife requested that the attorney client relationship be terminated; however, Wife owes earned fees to both of her attorneys and said attorney fee affidavits will be presented to the Court at the hearing of this Motion.

At the hearing on Friday, June 27, 2013 this Court ruled that Wife's attorney would escrow the support payments made by Husband each month and disburse funds necessary for Wife's bills and expenses. Counsel requests instructions regarding funds presently being held in escrow.

Copy

Respectfully submitted,

By:

JOANIE L. ABERNATHY, BPR #11382 136 Fourth Avenue South

Franklin, Tennessee 37064

(615) 790-1778

RUSS HELDMAN, BPR #9989

218 Fourth Avenue, North Franklin, Tennessee 37064

(615) 599-9420

Attorneys for Wife

THIS MOTION IS EXPECTED TO BE HEARD ON THE 26th DAY OF JULY, 2013 AT 9:00 A.M.

## CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing MOTION has been forwarded, via U.S. Mail, Michael and Scott Parsley, Attorneys for Husband, at 219 2<sup>nd</sup> Ave. N. Ste. 300, Nashville, TN 37201 and to Angelia Solomon, Wife at 2602 Abbott Martin Road, Nashville, TN 37215 on this day of \_\_\_\_\_\_\_, 2013.

JOANIE L. ABERNATHY

KUSS HELDMAN



Copy

IN THE FOURTH CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE

AARON L. SOLOMON,	2013 JUL -2 PM 4: 20
Plaintiff,	RICHARD R. ROOKLA
v.	Docket No. 13D=1446
ANGELIA SOLOMON,	j
Defendant.	)

# MOTION TO BE ALLOWED TO RETRIEVE CERTAIN ITEMS OF PERSONAL PROPERTY

Father moves this Honorable Court for leave of this Honorable Court to be allowed two (2) hours to access the marital residence to obtain clothing, toys and limited personal property for he and the minor children pending the final hearing of this matter. As cause, he would state and show unto this Honorable Court that the same was to be done by agreement on Monday, July 1, 2013, as indicated by the e-mail of her attorney, Ms. Abernathy. Apparently, subsequent to this confirmation, Ms. Solomon terminated both of her lawyers and will no longer honor the agreement. He, therefore, moves this Honorable Court to Order the same and that she not be present when Mr. Solomon obtains the clothing and the children's bicycles, etc.

Rospectfully submitted,

D. SCOTT PARSLEY, #13606

D. SCOTT PARSLEY & ASSOCIATES

219 Second Avenue, North, Suite 300

Nashville, TN 37201

(615) 244-8118

(615) 244-8842 Facsimile

Copy

## CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing document has been served on Joanie L. Abernathy, 136 Fourth Avenue South, Franklin, TN 37064; Russ Heldman, 218 Fourth Avenue North, Franklin, TN 37064; and Angelia Solomon, pro se, 2602 Abbott, Martin Road, Nashville, TN 37215, by placing same in the U. S. Mail, postage prepaid, on this \_\_\_\_\_ day of June, 2013.

B. SCOTT PARSLEY

THIS MOTION IS EXPECTED TO BE HEARD JULY 19, 2013, AT 9:00 A.M.







IN THE FOURTH CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE

AT NASHVILLE & Property

AARON L. SOLOMON, Plaintiff/Husband,

٧.

ANGELIA SOLOMON, Defendant/Wife. 2013 JUN 21 PM 2: 84

## WIFE'S ANSWER TO COMPLAINT FOR DIVORCE

COMES NOW the Wife, ANGELIA SOLOMON, by and through her attorneys of record,
Russ Heldman and Joanie L. Abernathy, and for her Answer to the Complaint for Divorce would
state as follows:

- 1. The Wife admits the accuracy of all the statistical information contained in Number 1 of the Complaint with the exception of subparagraph f. and would state that she has had only one (1) previous marriage and subparagraph q. and would state that the parties were married in the year 2001.
  - 2. The Wife admits the allegations made in Number 2 of the Complaint.
  - 3. The Wife denies the allegations made in Number 3 of the Complaint.
- 4. The Wife admits the allegations made in Number 4, but denies any validity to Husband's fear for safety of the children and himself.
- 5. The Wife denies all allegations made in Number 5 of the Complaint and would state that she is the fit and proper party to be named primary residential parent of the parties' minor children.
  - 6. The Wife admits the allegations made in Number 6 of the Complaint.

St/6.17.2013

Copy:

- 7. The Wife denies that she has exhibited bizarre behavior or comments or that she suffers from a mental illness. Wife denies that she has engaged in a course of conduct to alienate the children from their Father or attempted to goad him into arguments.
- 8. The Wife admits that she obtained an Order of Protection upon her release from Parthenon Pavilion, but denies that Husband has any grounds for a Temporary Restraining Order. Wife further denies that she attempted suicide and denies Husband's account of that incident. Wife would state that she told her friend what to write when obtaining the *Ex-Parte* Order of Protection.
- 9. The Wife denies that she attempted to hang herself with the blow dryer cord. Wife admits that she has no inheritance money coming, but instead that Husband does. Wife denies that she make up "tales" and denies that the only physical altercations are those which Wife initiates.
- 10. The Wife denies that Husband has any reason to be fearful for his safety of that of the children.

## AFFIRMATIVE DEFENSE

Pursuant to Rule 8.03 of the Tennessee Rules of Civil Procedure, the Wife would respectfully submit that any alleged misconduct on her part complained of by the Husband was justified by the Husband's ill conduct towards the Wife.

Husband fails to state a claim upon which relief can be granted.

All other allegations not hereinbefore admitted, explained, or denied are hereby denied as if fully denied.

AND NOW having fully answered the Complaint for Divorce filed by Husband, Wife prays that the same be dismissed with costs taxed to Husband and she reserves the right to file a Counter-Complaint against the Husband.

Copy,

Respectfully submitted,

Bv:

JOANIE L. ABERNATHY, BPR #11382

136 Fourth Avenue South Franklin, Tennessee 37064 (615) 790-1778

RUSS HELDMAN, BPR #9989 218 Fourth Avenue, North Franklin, Tennessee 37064 (615) 599-9420

Attorneys for Wife

### CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing ANSWER has been forwarded, via U.S. Mail, Michael and Scott Parsley, Attorneys for Husband, at 219 2<sup>nd</sup> Ave. N. Ste. 300, Nashville, TN 37201 on this day of \_\_\_\_\_\_\_, 2013.

JOANIE L. ABERNATHY RUSS HELDMAN



Hoba

IN THE FOURTH CIRCUIT CO	OURT FOR DAVIDSON COUNTY, TENNESSEE
AARON L. SOLOMON,	RICHARD AMIL
Plaintiff,	The ROOMER OF
٧.	Docket No. 13D-1446
ANGELIA SOLOMON,	
Defendant.	)

### MOTION TO STRIKE

Aaron L. Solomon, by and through counsel, hereby moves this Honorable Court to strike the Response to Father's Motion for Psychological Evaluation in its entirety from the record. As cause, Mr. Solomon would state and show unto this Honorable Court that the same is hearsay in total.

Respectfully submitted,

D. SCOTT PARSLEY, #13006
MICHAEL K. PARSLEY, #23817
D. SCOTT PARSLEY & ASSOCIATES
219 Second Avenue, North, Suite 300
Nashville, TN 37201
(615) 244-8118

(615) 244-8118 (615) 244-8842 Facsimile

#### CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing document has been served on Joanie L. Abernathy, 136 Fourth Avenue South, Franklin, TN 37064, and Russ Fleldman, 218 Fourth Avenue North, Franklin, TN 37064, by placing same in the U. S. Mail, postage prepaid, on this 2/5/day of June, 2013.

MICHAEL K. PARSLEX

THIS MOTION IS EXPECTED TO BE HEARD JUNE 21, 2013, AT 9:00 A.M.

1	IN THE FOURTH CIRCUIT COURT NO.
2	IN THE FOURTH CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE 14  AT NASHVILLE  AARON L. SOLOMON,
3	AARON L. SOLOMON,
4	Plaintiff,
5	vs. ) No. 13D-1446
6	ANGELIA SOLOMON, )
7	Defendant. )
8	
9	
10	TRANSCRIPT OF PROCEEDINGS
	June 21, 2013
11	Heard Before: HON. PHILIP SMITH, JUDGE
12	
13	APPEARANCES:
14	For the Plaintiff: Mr. Scott Parsley
15	Mr. Michael Parsley Parsley & Associates
16	219 Second Avenue North
17	Suite 300 Nashville, Tennessee 37201
18	For the Defendant: Ms. Joanie Abernathy
19	Attorney at Law 136 Fourth Avenue South
20	Franklin, Tennessee 37064
21	
22	Prepared by:
23	Susan D. Murillo, CCR 118 Wheaton Hall Lane
24	Franklin, Tennessee 37069
25	(615) 791-4767 Fax: 791-1337

1	I N D E X
2	WITNESS NAME Page
_	DAN HUFFINES
3	Direct Examination by Mr. Parsley
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*A* ...

#### PROCEEDINGS

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(Prospective witnesses duly sworn.)

THE COURT: Witnesses please step out 4 in the hallway. We'll call you when we're ready for 5 your testimony. Please don't discuss this case 6 amongst yourselves. Mr. Parsley, I think you filed 7

MR. PARSLEY: I think I did, your Honor. The first motion we filed was June the 5th, a motion for mental evaluation of Mrs. Solomon. I think we may have an agreement on that. I'll let Ms. Abernathy speak to that.

MS. ABERNATHY: We are not opposing the motion for the evaluation. We agreed this morning that husband would pay for it. We have not been able to agree on who the evaluator would be.

THE COURT: That's easy. I'll do Brad Freeman.

MS. ABERNATHY: That's perfect for us.

THE COURT: That's who I always use.

MR. PARSLEY: I thought since I was

paying I could pick.

the first motion.

THE COURT: No, it doesn't work that

way.

MR. PARSLEY: It doesn't work that 1 2 way? 3 THE COURT: No. MR. PARSLEY: I'll put that in my 4 5 memory. Your Honor, the next motion is a motion for 6 restraining order for Mrs. Solomon to quit going on 7 the Internet and Facebook and saying that father/ 8 husband has kidnapped the parties' minor children. 9 I think there's an agreement on that. 10 MS. ABERNATHY: There is. She would 11 dispute that it was she who started the chain of 12 communication that he kidnapped the children, but 13 with all that being said, she agrees. 14 THE COURT: Okay. 15 MS. ABERNATHY: We would like it to be 16 the mutual restraining order that neither --17 THE COURT: I think that's one that I 18 would make mutually. 19 MR. PARSLEY: Your Honor, may it 20 please the Court -- and I certainly understand that 21 maybe the mutual is the expedient thing to do, but 22 they won't have anything here to demonstrate that he said anything. 23 THE COURT: I know. It's like the 24

last case. You know, some things I will do mutual,

and that's one of them. So certain restraining orders.

MR. PARSLEY: I believe that concludes the motions on behalf of Mr. Solomon.

THE COURT: Okay.

MR. PARSLEY: I'm sorry. I apologize for that. We have one to strike. If it please the Court, they filed a motion, and in that motion they stated -- it's the motion for mental evaluation, Judge, and they made some statement as relates to what a Dr. Murphy says.

Then they say they're going to file his report. I haven't seen his report, but I would suggest to the Court that all this hearsay should be stricken from the record, if it please the Court, if they actually filed it. If they didn't file it, I want it stricken from the motion the statements that they claim that this Dr. Murphy ...

MR. MICHAEL PARSLEY: Your Honor, we're moving to strike their response to the motion for evaluation, and we filed the motion to strike the only time we could have, this morning, because we got their motion or the response to our motion yesterday about 4:30.

THE COURT: Well, I haven't seen the

responses. I'll be honest. I'm not inclined to strike pleadings. Pleadings are not evidence. It's in the record. It doesn't mean, you know, something is said in a pleading is true, but I hadn't read it, and I don't intend to read it.

MR. SCOTT PARSLEY: Here's the problem. It's not necessarily what a lawyer would offer. I understand that, but when a lawyer cites as part of a pleading what someone else told him,

that her --

THE COURT: But all pleadings are hearsay. Is the Complaint not hearsay?

most respectfully, that's hearsay. She is saying

MR. PARSLEY: Yes. The parties could verify that. They're here. Dr. Murphy is not here for me to cross-examine him on what these allegations or these statements are.

THE COURT: Well, I mean, I'm not going to consider those. I mean, if he's not here I can't consider it.

MR. PARSLEY: I understand, your Honor. It's just unusual that people quote something such as that.

THE COURT: Okay. Ms. Abernathy, I believe the floor is yours at this point.

MS. ABERNATHY: I have the motion to 1 return the vehicle, the Tahoe car. 2 THE COURT: Okay. 3 MS. ABERNATHY: Maybe I included that in my motion for temporary support. 5 MR. PARSLEY: I haven't seen it, 6 unless it's included in something else. 7 MS. ABERNATHY: It's in our motion for family support. 9 THE COURT: I don't remember seeing 10 that. I got the motion for family support. 11 MR. PARSLEY: It's not in the one I 12 13 have. THE COURT: Okay. 14 MS. ABERNATHY: Here's what I thought 15 I had done, but it may not be in there. We do need 16 to set temporary support, if your Honor please. It 17 would need to include an amount for a vehicle or 18 return the Tahoe to her. Will your Honor want 19 testimony on the family's --20 THE COURT: No. What I would like to 21 do -- let me kind of do them in a little bit 22 different order; first of all, in regard to the 23 motion to reinstate the health insurance. 24

25

MR. PARSLEY: It's not necessary, your

Ĵ. Honor, but the health insurance never lapsed. He 2 had a job. That job ended. There was Cobra at 1700. He's gone out and gotten insurance at a much 3 4 less expensive rate, and we told them about that, 5 your Honor. THE COURT: Do you know about that, 7 Ms. Abernathy? MS. ABERNATHY: I was told this morning that they had gotten State Farm Insurance for 300 a month. MR. PARSLEY: Farm Bureau. MS. ABERNATHY: Farm Bureau, that they would send us some forms for her to fill out so she could be added to the policy. If your Honor remembers, she was taken to Centennial Hospital for the evaluation. If COBRA is paid and he has signed them up for COBRA when his job ended, he just hadn't made that payment within 90 days. If the COBRA payment is made, then her Centennial would be

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THE COURT: How much is her Centennial bill?

day he was covered under their regular insurance.

covered because the COBRA is retroactive to the last

MS. ABERNATHY: We have no idea because it hasn't been billed. She gave them the

1	insurance card, or he did we don't know which
2	but it would be quite costly. Now, Mr. Parsley said
3	he would look into that, that for now she's covered
4	on insurance. It's just that I presume that
5	coverage takes effect after the filing of my motion.
6	Well, actually took effect yesterday, June 20, as
7	opposed to the better plan.
8	MR. PARSLEY: It doesn't take place
9	until July 1st. She still has to sign this.
10	THE COURT: Okay. Is the COBRA still
11	in effect right now?
12	MR. PARSLEY: The COBRA is \$1500 a
13	month. Neither one of these parties are employed.
14	THE COURT: Well, I understand that,
15	but Mr. Parsley, if this COBRA if it's going to
16	cover her stay, was it Centennial or Vanderbilt?
17	MS. ABERNATHY: It was Parthenon.
18	THE COURT: Parthenon.
19	MS. ABERNATHY: Centennial Parthenon.
20	THE COURT: I mean, isn't that going
21	to be a lot more than \$1500?
22	MR. PARSLEY: It would have to be paid
23	retroactively, your Honor. Be about \$5,000.
24	THE COURT: But won't that still be a
25	lot less than what's owed to Centennial?

MR. PARSLEY: I don't know if they 1 will cover it or not, your Honor, but certainly I assume it would be less than == she wasn't there ten 3 hours. They let her go so I don't know what the deal is. She should have gotten a bill because that occurred before this divorce was filed. 6 THE COURT: Wouldn't that be a -- was COBRA in effect at that time? MR. PARSLEY: Yes. It hadn't been paid because neither one of them has worked. 10 THE COURT: Well, I mean ... 11 MS. ABERNATHY: I was glad to leave 12 that decision to the husband rather than to the 13 Court. I was just trying to make the point that I 14 think that's worth exploring for the financial 15 benefit of the family. 16 THE COURT: I absolutely agree. 17 MS. ABERNATHY: She can't do it 18 because she was not the employee --19 THE COURT: I understand. 20 MS. ABERNATHY: -- or the COBRA 21 22 person. MR. PARSLEY: It's not in effect until 23 it's paid. We understand that there's no binders, 24 so paying it doesn't necessarily mean they would 25

1 cover that, but she should have gotten a bill by this time. It's been over a month, I think, since 2 3 she went for that ten hours. I mean, whichever one is less, we'll take care of, but we haven't seen the 5 bill. We just thought one would be here by now. 6 THE COURT: He hadn't gotten one. I 7 don't guess -- if it wasn't in effect he wouldn't get an EOB. So why don't the lawyers --8 9 MR. PARSLEY: I don't know how much it was for ten hours, but whichever one is less we'll 3.0 11 take care of it. 12 MS. ABERNATHY: I'll be glad to put 13 that in the order, that he will either sign up for 14 COBRA or pay the Centennial bill, and in the 15 meantime she'll do this. Thank you for that order. 16 THE COURT: All right. The next 17 motion, let's talk about --18 MR. PARSLEY: I'm sorry, Judge. 19 Pardon my interruption. The 24th is the deadline 20 for COBRA, so she has to let us have a bill to tell 21 us what that is before then. 22 THE COURT: Why don't y'all call 23 Centennial today? 24 MR. PARSLEY We're not allowed to do 25 that.

1 MS. ABERNATHY: I'll put in the order 2 that she'll produce something by Monday. THE COURT: Is that timely enough? MR. PARSLEY: That would be 5 sufficient, Judge, as long as we have in our hands by Monday. Ms. Abernathy can fax it over. 7 THE COURT: Let's just make sure to get that to them on Monday so they can make 9 that decision. All right. Before we get into the 10 temporary parenting plan or temporary family 11 support, let's talk about the restraining order. 12 MR. PARSLEY: Monday is the 24th 13 though, Judge, isn't it? We got to know by Monday 14 morning. 15 MS. ABERNATHY: We'll do it Monday 16 morning. 17 THE COURT: Motion to resolve the 18 restraining order. Let's talk about that. This is 19 your motion, Ms. Abernathy? 20 MS. ABERNATHY: Yes, please. To the 21 extent that your Honor will consider dissolving the 22 restraining order in order to allow supervised 23 contact with the children pending this agreed upon 24 evaluation, to the extent that she can have limited 25 phone contact with the children, go to their games,

1 is what we're asking. THE COURT: Mr. Parsley? MR. PARSLEY: We would like proof to be put on, if it please the Court. 5 THE COURT: I don't generally allow 6 proof. 7 MR. PARSLEY: I'm sorry? 8 THE COURT: I don't generally allow proof. Why would you be upset with supervised 9 visitation, phone contact -- or limited supervised 10 visitation, phone contact and her to go to the 11 12 games? 13 MR. PARSLEY: Because her behaviors 14 are bizarre, Judge. Since you had entered this 15 restraining order, and then you dealt with the order 16 of protection, she has been incessant in the e-mails 17 and text messages that she sends to Mr. Solomon where's she's going to kill herself. She said she's 18 19 going to let his dogs die. 20 She has apparently surreptitiously 21 been sending some information to the parties' young 22 son saying that Daddy has her locked up in the 23 house. She writes a suicide letter that she's going 24 to kill herself. Her parents are here, your Honor,

to testify today, which is a highly unusual

circumstance, but I proposed to them the suggestion of supervising.

Unfortunately, her father said, "I would not want her in my house and me be asleep."

MS. ABERNATHY: May I object to

hearsay?

MR. PARSLEY: I'll bring them in, Judge. That's why I --

THE COURT: Well, let me -- I mean, first of all, before we get into any of the family members, have you seen these alleged text messages Mr. Parsley has?

MS. ABERNATHY: He showed me -- I was just pulling it out. He showed me a document that he thinks she sent to their son. She doesn't recognize it. She would deny sending it, but at the bottom it appears that it was a conversation between he and an Ethan, but it says, "Gee, I love you. I'm locked up at home."

it. Now, she did -- after your Honor signed the restraining order, Mr. Solomon came back home, and there's some dispute about that, but when -- between the 10th of May and Memorial Day when he came back home, he had the dogs with him, and he and the

1 | at that.

1.9

Assuming what Mr. Parsley is telling me is true about her father saying this, you know, that would indicate a tremendous concern by him.

MS. ABERNATHY: Wouldn't it, though?

And what should be concerning to the Court too is
the family history between she and her own parents.

In 2008 she sought an order of protection against
that gentleman who wants to come in and say I
wouldn't let her sleep in my house, so there is a
history of at least ten years about --

THE COURT: What is that relationship between her and her parents for the last year?

MS. ABERNATHY: Nonexistent, strained

is how I should say it. Strained.

THE COURT: You know, I think that at this point -- and I normally don't hear proof, but I would like to hear from her parents individually at this point.

MR. PARSLEY: May I call them, and if I could, while they're coming in, if your Honor would look at the motion to resolve the restraining order that was filed, on behalf of Mrs. Solomon, particularly, if it please the Court, paragraph two wherein they state -- state that the evidence will

show she is not detached from reality, that she did not threaten or attempt suicide. Judge, I think your Honor wants people to tell the truth when they come in here, wants people to be credible. Your Honor, you're going to find out that Ms. Solomon is not credible but, more importantly, you're going to find that she has been less than candid with her counsel as to what her activities have been. THE COURT: All right, sir. Would you take the stand, please. MR. PARSLEY: Mr. Huffines, your Honor. 2.2 

1	DAN HUFFINES,
2	having been first duly sworn as a witness, on behalf
3	of the Plaintiff, was examined and testified as
4	follows:
5	THE COURT: Will you state your name
6	for the record.
7	THE WITNESS: Dan Huffines.
8	
9	DIRECT EXAMINATION
10	BY MR. PARSLEY:
11	Q. Mr. Huffines, Angelia Solomon is your
12	daughter; is that correct?
13	A. That's correct.
1.4	Q. Did I pose a question to you earlier
15	this morning as to whether or not you would be
16	amenable to supervising parenting time for your
- 17	daughter and the children? Do you recall that
18	question?
19	A. Yes, I recall that question.
20	Q. Do you recall your response to me,
21	sir?
22	A. I would be very concerned to do that
23	at this time.
24	Q. Did you say you wouldn't want her
25	staying in the house while asleep?